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7 IMPERIALS CAR CLUB

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 IMPERIALS CAR CLUB,

12 Plaintiff,

13 v.

14 CHARLES CHRISTOPHER MONTOYA
a/k/a CHUCK MONTOYA and CLASSIC
15 CARS OF NEW MEXICO a/k/a
CLASSIC CAR OF NEW MEXICO a/k/a
16 MAD HOPPER HYDRAULICS,

17 Defendants.

18 Case No. 2:18-cv-10243-JAK (KSx)

19 **DECLARATION OF STEVEN E.
LAURIDSEN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES**

20 Date: May 13, 2019
21 Time: 8:30 a.m.
22 Ctrm: 10B

23 Hon. John A. Kronstadt

1 I, Steven E. Lauridsen, declare as follows:

2 1. I am an attorney at Tucker Ellis LLP, counsel of record in this action for
3 Plaintiff Imperials Car Club. I make this declaration based on my personal knowledge and,
4 if called as a witness, would testify competently to each of the following facts.

5 2. Plaintiff incurred \$20,152.50 in attorneys' fees in connection with this action.
6 Per the Court's standing order, a table detailing these fees by task is attached as Exhibit 1,
7 and a table detailing these fees by attorney is attached as Exhibit 2.

8 3. Three attorneys and one paralegal billed in this litigation. The three attorneys
9 were David J. Steele, Sandra J. Wunderlich, and me. The paralegal was Shelby K. Fowler.

10 4. Mr. Steele graduated from Loyola Law School and has approximately
11 19 years of intellectual property litigation experience. His rates for this matter were \$550
12 per hour in 2018 and \$575 per hour in 2019.

13 5. Ms. Wunderlich graduated from the University of Missouri School of Law.
14 She has approximately 25 years of intellectual property litigation experience. Her rate in
15 2018 was \$515 per hour. Ms. Wunderlich did not bill on this matter in 2019.

16 6. I graduated from the University of Southern California School of Law and
17 have approximately 12 years of litigation experience. I billed in this matter at a rate of \$465
18 per hour in 2018 and \$490 per hour in 2019.

19 7. Ms. Fowler has 6.5 years of experience working as a paralegal. She billed
20 1 hour in this action at a rate of \$190 per hour.

21 8. Portions of the *AIPLA 2017 Report of the Economic Survey* published by the
22 American Intellectual Property Law Association listing rates for intellectual property cases
23 in the Los Angeles area are attached as Exhibit 3.

24
25 I declare under penalty of perjury under the laws of the United States that the
26 foregoing is true and correct and that this declaration was executed on March 18, 2019 in
27 Los Angeles, California.

28

/s/Steven E. Lauridsen
STEVEN E. LAURIDSEN